September 14, 2005

Via over night mail

Docketing Department Public Service Commission of South Carolina P.O. Drawer 11649 Columbia, SC 29211

RE: DOCKET NO. 2005-139-C – 800 Response Information Services LLC – Application for a Certificate of Public Convenience and Necessity to Provide Long Distance Telecommunications Services and for Alternative Regulation of its Long Distance Services

## Dear Docketing Department:

Enclosed please find an original and 10 copies of 800 Response Information Services LLC's Motion to Present Witness Via Telephone with respect to the above referenced matter.

Please feel free to contact me if you have any questions regarding the enclosed document.

Sincerely,

Robert Cleary

Director of Accounting

**Enclosure** 

CC: Benjamin P. Mustian

RECEIVED

SEP 15 2005

PSC SC

MAIL DMS

#### **BEFORE THE**

# **PUBLIC SERVICE COMMISSION**

## OF SOUTH CAROLINA

APPLICATION OF 800 RESPONSE INFORMATION	)
SERVICES LLC FOR A CERTIFICATE OF	)
PUBLIC CONVENIENCE AND NECESSITY TO	)
PROVIDE RESOLD LONG DISTANCE	) DOCKET NO. 2005-139-C
TELECOMMUNICATIONS SERVICES	)
AND FOR ALTERNATIVE REGULATION OF ITS	ý
LONG DISTANCE SERVICE OFFERINGS	Ś

## MOTION TO PRESENT WITNESS VIA TELEPHONE

Applicant 800 Response Information Services LLC respectfully asks the Commission for permission to allow its witness to present her testimony during the hearing scheduled for October 3, 2005 via the telephone. In support of its motion, Applicant respectfully states the following:

- 1. Applicant is a small reseller of toll-free "800" services. Its sole office is located in Burlington, Vermont.
- 2. Applicant filed the Direct Testimony of Linda Young, Director of Operations, dated September 6, 2005, in support of its application, as required by the Commission rules.
- 3. Applicant is also in the process of retaining local counsel, who will attend the October 3, 2005 hearing in person.
- 4. It would be a hardship, however, for Applicant and for Ms. Young to have Ms. Young travel to South Carolina to attend the hearing in person. Ms. Young lives in

Vermont. She is a key employee of the Applicant and is responsible for overseeing much of the day to day operations.

- 5. Because Applicant is proposing to provide only a limited type of service in South Carolina (inbound toll-free services), neither the Commission nor the general public should be harmed if Applicant is allowed to present its witness by telephone. While Applicant acknowledges that the application process to provide such services is different in each states, none of the other 32 state regulatory bodies that have already granted Applicant the right to provide its services within their states have required a personal appearance by Applicant (one state did require a personal appearance by Applicant's attorney).
- 6. Finally, if after the hearing by telephone, the Commission desires to have the Applicant's witness appear in person, the hearing can thereafter be continued to allow such for personal appearance.

Wherefore, for the above stated reasons, Applicant respectfully asks that the Commission allow it to present its witness via telephone during the October 3, 2005 hearing.

Robert Cleary

Director of Accounting

800 Response Information Services LLC

200 Church St., PO Box 1049

Burlington, VT 05402

802-860-0378

Burlington, VT September 14, 2005